

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

GSB GOLD STANDARD CORPORATION  
AG, JOSIP HEIT, ANTONIO EUCLIDES  
MENESIS DE GOUVEIA, and MICHAEL  
DALCOE,

Plaintiffs,

V.

CHRISTOPHER SAUNDERS,

Defendant.

Case No. 1:21-cv-1398 (RDA/IDD)

# NOTICE OF FILING OF DECLARATION OF CHRISTOPHER SAUNDERS

COMES NOW, Christopher Saunders, Defendant in the above-referenced action, by counsel and with the signature of counsel for Plaintiffs GSB Gold Standard Corporation AG, Josip Heit, Antonio Euclides Menesis De Gouveia, and Michael Dalcoe, submits the Declaration of Christopher Saunders (the “Declaration”) attached as Exhibit “A”, in Support of Plaintiffs’ Stipulation of Dismissal without Prejudice filed on July 29, 2022 (the “Joint Stipulation”). To the extent the filing of this Declaration is deemed to require leave, Defendant, by counsel and with the signature and agreement of counsel for Plaintiffs GSB Gold Standard Corporation AG, Josip Heit, Antonio Euclides Menesis De Gouveia, and Michael Dalcoe, respectfully requests leave to file this Declaration.

Respectfully submitted this 29<sup>th</sup> day of July 2022.

Dated: July 29, 2022

Respectfully submitted,

/s/ Laurin H. Mills (with consent)

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SEEN AND AGREED

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*Attorneys for Plaintiffs GSB Gold Standard  
Corporation AG, Josip Heit, Antonio Euclides  
Menesis De Gouveia, and Michael Dalcoe*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29 day of July, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which sends electronic notification of such filing to all CM/ECF participants.

\_\_\_\_\_/s/ Laurin H. Mills

## EXHIBIT "A"

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

GSB GOLD STANDARD CORPORATION )  
AG, JOSIP HEIT, ANTONIO EUCLIDES )  
MENESIS DE GOUVEIA, and MICHAEL )  
DALCOE, )

Plaintiffs, )

v. )

CHRISTOPHER SAUNDERS, )

Defendant. )

Case No. 1:21-cv-1398 (RDA/IDD)

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**DECLARATION OF CHRISTOPHER SAUNDERS**

COMMONWEALTH OF VIRGINIA )

COUNTY OF STAFFORD )

Comes now, Christopher Saunders, who being duly sworn, under oath, and subject to the penalty of perjury, hereby swears, deposes, and affirms as follows:

1. My name is Christopher Saunders. I am the defendant in the above-captioned action.
2. As alleged in the complaint filed in the above-captioned action, I was the sole owner, contributor, and operator of the following social media channels (the "**Saunders' Social Media Channels**") as of the date this action was initiated:
  - a. [www.youtube.com/c/GritGrindGold](http://www.youtube.com/c/GritGrindGold);
  - b. [www.instagram.com/gritgrindgold](http://www.instagram.com/gritgrindgold);
  - c. <https://www.twitter.com/24karatchris>; and
  - d. <https://www.facebook.com/24karatchris>.

3. I admit and acknowledge that I made, and published on the Saunders' Social Media Channels, each and every of the statements attributed to me in the complaint (the "**Statements**").
4. I also admit that the Statements generally asserted various allegations and accusations against Gold Standard Bank ("**GSB**") and its principals and agents, including Josip Heit, Antonio De Gouveia, and Michael Dalcoe, which were accurately summarized in the complaint as follows (the "**Allegations**"):
  - a. That GSB and its principals and agents (including Josip Heit, Antonio De Gouveia, and Michael Dalcoe) are or were engaged in a ponzi scheme;
  - b. That GSB and its principals and agents (Josip Heit, Antonio De Gouveia, and Michael Dalcoe) are or were engaged in criminal acts; and
  - c. That GSB and Karatbars are or were the same entity.
5. As of the date I made each and every of the Statements and/or Allegations, I did not have personal first-hand knowledge sufficient to substantiate the substance of any of the Statements or the Allegations.
6. As of the execution date of this Declaration, I still do not have personal first-hand knowledge of any facts or factual allegations sufficient to substantiate the substance of any of the Statements or the Allegations.
7. I was aware, via first-hand knowledge, of facts and documents that any purported wrongdoing carried out by Karatbars in connection with its Miami crypto bank and the issuance of KCB/KBC tokens was perpetrated by Karatbars'

CEO, Mr. Harald Seiz, and that said wrongdoing was perpetrated before any affiliation between Karatbars and GSB/Mr. Heit.

8. By executing this Declaration, I further admit and acknowledge the following facts:

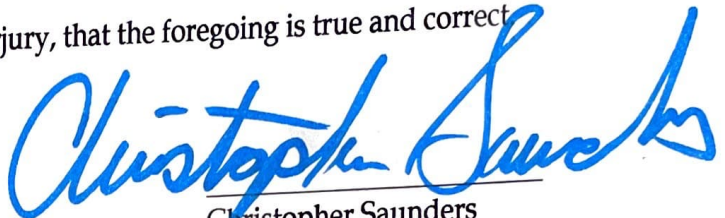
- a. I began making the Statements and Allegations after I launched the Saunders' Social Media Channels or around January 2020.
- b. Since January 2020, I received five thousand dollars in Bitcoin from Mr. Ovidu Toma in connection with making the Statements and Allegations against Plaintiffs.
- c. Since January 2020, Mr. Ovidu Toma has been providing me with documents and materials evidencing Karatbars' purported wrongdoing, and these documents and materials corroborate Mr. Harald Seiz's role in Karatbars' purported wrongdoing.

9. By executing this Declaration, I also admit and acknowledge the following facts:

- a. Between 2020 and approximately May 2022, I regularly communicated with Christopher Wayne McDaniel (AKA Chris Trade), Louis Nel, Francois Harris, and Gert Christoffel Grobler (AKA Gareth Grobler) through private chats and calls using my Telegram account (the "**Private Telegram Communications**").
- b. Between 2020 and approximately May 2022, my Private Telegram Communications with McDaniel, Nel, Harris, and Grobler more often than not involved discussion of one or more of the Plaintiffs.



- c. Between late 2021 and approximately May 2022, my Private Telegram Communications with McDaniel, Nel, Harris, and Grobler took place on a frequent basis, often daily and at least once a week on average.
  - d. On or around May 2022, my Private Telegram Communications with McDaniel, Nel, Harris, and Grobler were deleted.
  - e. I did not delete my Private Telegram Communications with McDaniel, Nel, Harris, and Grobler.
10. I declare, under penalty of perjury, that the foregoing is true and correct

  
Christopher Saunders

DATED: 7/29/22